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**FEB 11 2000**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

February 10, 2000

Commissioner Michael K. Powell  
Federal Communications Commission  
Room 8-A204  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-2820

Dear Commissioner Powell:

**SUBJECT: WT DOCKET NO. 97-207: CALLING PARTY PAYS SERVICE OFFERING IN THE  
COMMERCIAL MOBILE RADIO SERVICES**

As a member of ACUTA, Indiana State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. We are a non-profit educational institution and are deeply concerned that without appropriate safeguards, CPP will expose us to significant financial liability that would undermine our ongoing effort to provide educational services.

Indiana State University currently has almost 12,000 students and over 1,500 employees. We have an extensive telephone infrastructure readily accessible to this large number of student and employee users. Because of this, we face the very real threat of uncontrollable, unauthorized CPP calls for which the University would be liable.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a PBX owned and controlled by the University. Our PBX can easily be programmed to block or track call detail for a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (e.g., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from her or his dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables us to bill the individual caller for their toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the appropriate person.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. However, this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for the charges he or she incurred. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by the taxpayers of the State of Indiana. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers.

Commissioner Powell

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With very little effort, and at almost no cost, our PBX could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save Indiana State University the considerable expense and disruption of upgrading or replacing the PBX we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a nonprofit state supported educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest – and accommodate the needs of educational institutions such as ours – by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Richard H. Wells  
Provost and Vice President  
for Academic Affairs

RHW/kc

cc: Peter A. Tenhula, Senior Legal Advisor to Commissioner Powell

February 10, 2000

Commissioner Gloria Tristani  
Federal Communications Commission  
Room 8-C302  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-7542

Dear Commissioner Tristani:

SUBJECT: WT DOCKET NO. 97-207: CALLING PARTY PAYS SERVICE OFFERING IN THE  
COMMERCIAL MOBILE RADIO SERVICES

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Sincerely,

Richard H. Wells  
Provost and Vice President  
for Academic Affairs

RHW/kc

cc: Adam Krinsky, Legal Advisor to Commissioner Tristani

February 10, 2000

Ms. Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
Room TW-A324  
445 Twelfth Street, S.W.  
Washington, DC 20554

SUBJECT: WT DOCKET NO. 97-207: CALLING PARTY PAYS SERVICE OFFERING IN THE  
COMMERCIAL MOBILE RADIO SERVICES

Dear Ms. Salas:

As a member of ACUTA, Indiana State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. We are a non-profit educational institution and are deeply concerned that without appropriate safeguards, CPP will expose us to significant financial liability that would undermine our ongoing effort to provide educational services.

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Sincerely,

Richard H. Wells  
Provost and Vice President  
for Academic Affairs

February 10, 2000

Commissioner Susan Ness  
Federal Communications Commission  
Room 8-B115  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-2821

Dear Commissioner Ness:

SUBJECT: WT DOCKET NO. 97-207: CALLING PARTY PAYS SERVICE OFFERING IN THE  
COMMERCIAL MOBILE RADIO SERVICES

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Indiana State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. We are a non-profit educational institution and are deeply concerned that without appropriate safeguards, CPP will expose us to significant financial liability that would undermine our ongoing effort to provide educational services.

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Sincerely,

Richard H. Wells  
Provost and Vice President  
for Academic Affairs

RHW/kc

cc: Mr. Mark Schneider, Senior Legal Advisor to Commissioner Ness



February 10, 2000

Chairman William E. Kennard  
Federal Communications Commission  
Room 8-B201  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-2801

Dear Chairman Kennard:

SUBJECT: WT DOCKET NO. 97-207: CALLING PARTY PAYS SERVICE OFFERING IN THE  
COMMERCIAL MOBILE RADIO SERVICES

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Sincerely,

Richard H. Wells  
Provost and Vice President  
for Academic Affairs

RHW/kc

cc: Mr. Ari Fitzgerald, Legal Advisor to Chairman Kennard

February 10, 2000

Mr. Joe Levin  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-B135  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-7247

Dear Mr. Levin:

SUBJECT: WT DOCKET NO. 97-207: CALLING PARTY PAYS SERVICE OFFERING IN THE  
COMMERCIAL MOBILE RADIO SERVICES

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Sincerely,

Richard H. Wells  
Provost and Vice President  
for Academic Affairs

RHW/kc

February 10, 2000

Mr. David Siehl  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-A164  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-7247

Dear Mr. Siehl:

SUBJECT: WT DOCKET NO. 97-207: CALLING PARTY PAYS SERVICE OFFERING IN THE  
COMMERCIAL MOBILE RADIO SERVICES

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Sincerely,

Richard H. Wells  
Provost and Vice President  
for Academic Affairs

RHW/kc

February 10, 2000

Ms. Kris Monteith  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-C122  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-7247

Dear Ms. Monteith:

SUBJECT: WT DOCKET NO. 97-207: CALLING PARTY PAYS SERVICE OFFERING IN THE  
COMMERCIAL MOBILE RADIO SERVICES

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As a nonprofit state supported educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest – and accommodate the needs of educational institutions such as ours – by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Richard H. Wells  
Provost and Vice President  
for Academic Affairs

RHW/kc



February 10, 2000

Commissioner Harold W. Furchtgott-Roth  
Federal Communications Commission  
Room 8-A302  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-2802

Dear Commissioner Furchtgott-Roth:

SUBJECT: WT DOCKET NO. 97-207: CALLING PARTY PAYS SERVICE OFFERING IN THE  
COMMERCIAL MOBILE RADIO SERVICE

As a member of ACUTA, Indiana State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. We are a non-profit educational institution and are deeply concerned that without appropriate safeguards, CPP will expose us to significant financial liability that would undermine our ongoing effort to provide educational services.

Indiana State University currently has almost 12,000 students and over 1,500 employees. We have an extensive telephone infrastructure readily accessible to this large number of student and employee users. Because of this, we face the very real threat of uncontrollable, unauthorized CPP calls for which the University would be liable.

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We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. However, this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for the charges he or she incurred. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by the taxpayers of the State of Indiana. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBX could be programmed to recognize the designated CPP

Commissioner Furchtgoth-Roth  
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Sincerely,

Richard H. Wells  
Provost and Vice President  
for Academic Affairs

RHW/kc

cc: Bryan Tramont, Legal Advisor to Chairman Furchtgott-Roth

February 10, 2000

Commissioner Susan Ness  
Federal Communications Commission  
Room 8-B115  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-2821

Dear Commissioner Ness:

SUBJECT: WT DOCKET NO. 97-207: CALLING PARTY PAYS SERVICE OFFERING IN THE  
COMMERCIAL MOBILE RADIO SERVICES

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Indiana State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. We are a non-profit educational institution and are deeply concerned that without appropriate safeguards, CPP will expose us to significant financial liability that would undermine our ongoing effort to provide educational services.

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We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of

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Sincerely,

Richard H. Wells  
Provost and Vice President  
for Academic Affairs

RHW/kc

cc: Mr. Mark Schneider, Senior Legal Advisor to Commissioner Ness

February 10, 2000

Chairman William E. Kennard  
Federal Communications Commission  
Room 8-B201  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-2801

Dear Chairman Kennard:

SUBJECT: WT DOCKET NO. 97-207: CALLING PARTY PAYS SERVICE OFFERING IN THE  
COMMERCIAL MOBILE RADIO SERVICES

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Indiana State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. We are a non-profit educational institution and are deeply concerned that without appropriate safeguards, CPP will expose us to significant financial liability that would undermine our ongoing effort to provide educational services.

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Chairman Kennard  
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Sincerely,

Richard H. Wells  
Provost and Vice President  
for Academic Affairs

RHW/kc

cc: Mr. Ari Fitzgerald, Legal Advisor to Chairman Kennard

February 10, 2000

Mr. Joe Levin  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-B135  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-7247

Dear Mr. Levin:

SUBJECT: WT DOCKET NO. 97-207: CALLING PARTY PAYS SERVICE OFFERING IN THE  
COMMERCIAL MOBILE RADIO SERVICES

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Mr. Levin  
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Sincerely,

Richard H. Wells  
Provost and Vice President  
for Academic Affairs

RHW/kc



February 10, 2000

Commissioner Harold W. Furchtgott-Roth  
Federal Communications Commission  
Room 8-A302  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-2802

Dear Commissioner Furchtgott-Roth:

SUBJECT: WT DOCKET NO. 97-207: CALLING PARTY PAYS SERVICE OFFERING IN THE  
COMMERCIAL MOBILE RADIO SERVICE

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Commissioner Furchtgoth-Roth  
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Sincerely,

Richard H. Wells  
Provost and Vice President  
for Academic Affairs

RHW/kc

cc: Bryan Tramont, Legal Advisor to Chairman Furchtgott-Roth

February 10, 2000

Commissioner Michael K. Powell  
Federal Communications Commission  
Room 8-A204  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-2820

Dear Commissioner Powell:

**SUBJECT: WT DOCKET NO. 97-207: CALLING PARTY PAYS SERVICE OFFERING IN THE  
COMMERCIAL MOBILE RADIO SERVICES**

As a member of ACUTA, Indiana State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. We are a non-profit educational institution and are deeply concerned that without appropriate safeguards, CPP will expose us to significant financial liability that would undermine our ongoing effort to provide educational services.

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Sincerely,

Richard H. Wells  
Provost and Vice President  
for Academic Affairs

RHW/kc

cc: Peter A. Tenhula, Senior Legal Advisor to Commissioner Powell